

How the Voice Link Trial on Fire Island Has Failed to Meet Suitability Requirements

On July 8, 2013, Public Knowledge provided the following Comment to the FCC as regards the FCC Technology Transitions Policy Task Force Seeks Comment on Potential Trials, GN Docket No. 13-5, at [Before the Federal Communications ... - Public Knowledge](#).

Its findings have direct application to WC#13-150, and are therefore being placed as a Comment into the Public record, so its findings and conclusions can be considered by the FCC as part of its review of Verizon of New York, Inc.'s Wireline Emergency Discontinuance Application under Section 214(a)

The Report stated the following:

As the Commission considers its proposed pilot programs for the phone network transition, it must first recognize the very real lessons to be learned from the consequences of Verizon's recent decision to replace its copper infrastructure with a fixed wireless service in certain communities hit by Hurricane Sandy last October.

Lessons from Verizon's Failed Fire Island Voice Link Deployment.

The Commission noted in passing in the instant *Public Notice* that Verizon is, subject to approval by the New York Public Service Commission (NY PSC), determined to replace copper facilities on Fire Island with its wireless "Voice Link" product. The Commission stated that it "hope[d] to learn from these ongoing efforts." In the two months since Verizon began its "involuntary beta test" for Fire Island, one lesson has become abundantly clear.

Consumers hate being used as guinea pigs against their will.

As of the date of this filing, more than half of the permanent residents of Fire Island have written negative comments on Verizon's Voice Link deployment. Residents have complained about poor voice quality, loss of international calling services, and loss of the ability to process credit card payments or send and receive faxes.⁶ One permanent resident describes her desperate need for a landline so that the local hospital can monitor her husband's pacemaker.

But above all else, consumers filing in the NY PSC Voice Link express their outrage and sense of betrayal. "I am absolutely SHOCKED that Verizon is simply pulling the plug on ALL landline/internet service to this otherwise fully viable and thriving *post-Sandy* community." "Please do not allow Verizon to put us in even more jeopardy by taking away our landline service and forcing us to rely on a half-baked wireless service." "Fire Islanders shouldn't be treated as 2nd class citizens." "Please don't allow Verizon to cut our lines without offering a suitable option. VOICE LINK DOESNT WORK."

Verizon's botched Fire Island "pilot" has become a textbook case on how to alienate a community and send ripples of fear with regard to the upcoming transition of the Public Switched Telephone Network (PSTN) through the general public. Verizon's continued insistence that it believes its service is sufficient despite missing features only furthers the belief that Verizon is not listening to the very real concerns of the public on this critical policy matter.

Community Engagement and Consumer Safeguards Will Be Key to Any Successful Pilot Program.

Verizon's ill-received Voice Link "pilot program" demonstrates that communities cannot be forced to transition to a new technology without risking disastrous results. This is doubly true if the provider unilaterally decides to completely remove support for features

that had previously relied upon the existing network infrastructure. Services that providers do not consider crucial, such as the ability to send and receive faxes, may be of considerable importance to subscribers.

Voice quality issues, particularly with regard to copper-to-wireless conversions, worry both residential and small business customers. Providers seeking to engineer successful pilot programs will not seek to ride roughshod over community objections.

This requires deliberation and significant advanced planning. Fire Island proves the wisdom of the deliberate approach taken by the Commission's staff. Those dancing with impatience to start shifting consumers to untried services and new technologies, who characterized this public notice as a "missed opportunity," should take the lesson of the Fire Island debacle to heart. By requiring more detailed plans and appropriate consumer protections, the task force has saved those eager to rush in from the consequences of their own folly.

The headlong rush into the unknown, first proposed by AT&T and urged since then by others, will not hasten the deployment of new services for the benefit of all Americans. Rather, as with the attempt to force Voice Link on an unwilling Fire Island, a hasty and poorly constructed pilot program will do more to delay the technological transition than any delay taken to plan a proper pilot.

(Footnotes provided in original)

Sincerely,

Jim Rosenthal
Resident, Fire Island
(917) 362-9491
jrosenthal@mintzgroup.com